```
EILEEN M. DECKER
 1
    United States Attorney
 2
    LAWRENCE S. MIDDLETON
    Assistant United States Attorney
 3
    Chief, Criminal Division
    JULIUS J. NAM (Cal. Bar No. 288961)
    SAURISH APPLEBY-BHATTACHARJEE (Cal. Bar No. 286264)
 4
    Assistant United States Attorneys
 5
    General Crimes Section
         1200 United States Courthouse
 6
         312 North Spring Street
         Los Angeles, California 90012
 7
         Telephone: (213) 894-4491/2917
         Facsimile: (213) 894-0141
 8
         E-mail:
                    julius.nam@usdoj.gov
                    saurish.bhattacharjee@usdoj.gov
 9
    Attorneys for Plaintiff
10
    UNITED STATES OF AMERICA
11
                         UNITED STATES DISTRICT COURT
12
                    FOR THE CENTRAL DISTRICT OF CALIFORNIA
    UNITED STATES OF AMERICA,
                                        CR No. 15-00621-R-6
13
14
              Plaintiff,
                                         STIPULATION AND JOINT REQUEST TO
                                        AMEND SENTENCE FOR DEFENDANT
15
                                        ANTHONY TNGRYAN
                   v.
16
    ANTHONY TNGRYAN,
17
              Defendant.
18
19
         Plaintiff United States of America, by and through its counsel
20
    of record, the United States Attorney for the Central District of
21
    California and Assistant United States Attorneys Julius J. Nam and
22
    Saurish Appleby-Bhattacharjee, and defendant Anthony Tngryan
23
    ("defendant"), by and through his counsel of record, Gevork
```

1. On March 7, 2016, the parties entered into a written plea agreement, pursuant to which defendant pleaded guilty to Count One of the twenty-count indictment in the above-captioned case, which charged defendant with conspiracy to possess fifteen or more

Chilingaryan, hereby stipulate as follows:

24

25

26

27

28

unauthorized access devices, in violation of 18 U.S.C. § 1029(b)(2). (ECF No. 174.)

- 2. The statutory maximum sentence for a violation of 18 U.S.C. § 1029(b)(2) is: five years' imprisonment; a fine of \$250,000 or twice the gross gain or gross loss resulting from the offense, whichever is greatest; a three-year period of supervised release; and a mandatory special assessment of \$100.
- 3. On May 23, 2016, defendant appeared for sentencing before the Court. The Court sentenced defendant to 18 months' imprisonment, to be followed by 4 years' supervised release, as well as a mandatory special assessment of \$100 and a waiver of fines.
- 4. The Court's imposition of a 4-year term of supervised release exceeds the statutory maximum term of supervised release for the offense with which defendant was convicted.

15 ///

16 | ///

17 | ///

1	5. The parties respectfully request that the Court amend
2	defendant's sentence to reflect a term of supervised release no
3	greater than 3 years, and that this amendment be reflected in the
4	Judgment and Commitment Order of the Court as to defendant.
5	
6	Dated: May 23, 2016 Respectfully submitted,
7	EILEEN M. DECKER United States Attorney
8	LAWRENCE S. MIDDLETON Assistant United States Attorney
9	Chief, Criminal Division
10	/s/ Saurish Appleby-Bhattacharjee
11	JULIUS J. NAM SAURISH APPLEBY-BHATTACHARJEE
12	Assistant United States Attorneys Attorneys for Plaintiff
13	UNITED STATES OF AMERICA
14	
15	Respectfully submitted,
16	
17	/s/ (authorized by email on 5/23/16)_
18	Dated: May 23, 2016 GEVORK CHILINGARYAN Attorney for Defendant
19	ANTHONY TNGRYAN
20	
21	
22	
23	
24	
25	
26	
27	
28	